



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

400 Seventh Street, S.W.
Washington, D.C. 20590

JAN 13 1999

Ms. Diane H. Kennedy
Trojan Battery Company
12380 Clark Street
Santa Fe Springs, CA 90670

Ref. No. 98-0358

Dear Ms. Kennedy:

This is in response to your letter dated November 11, 1998, regarding packaging requirements of lead pasted plates for batteries classified and described as "RQ, Environmentally hazardous substances, solid, n.o.s. (Lead), 9, UN3077, PGIII," under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask if the container described in your letter meets the definition of a closed bulk bin.

A non-specification closed bin, as authorized under § 173.240, must be an enclosed packaging that is tough, firm and durable (i.e., strong), constructed so that its contents cannot pass through (i.e., completely enclosed), and which meets other applicable requirements of § 173.24 and § 173.24b. The container described in your letter would appear to meet the packaging requirements in § 173.240(c).

I hope this satisfies your request.

Sincerely,

John A. Gale

Transportation Regulations Specialist
Office of Hazardous Materials Standards

173.240



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§ 173.240 98-0358
§ 173.240

November 11, 1998

James E. Jones
Chief, Approval Branch
DOTRSPADHM - 32
400 7th Street Southwest Room 8436
Washington, DC 20590

Re: Request for approval of an alternative packaging scheme.

Dear James E. Jones:

Trojan Battery Company is requesting approval of a proposed packaging scheme for shipping of lead pasted plates. Trojan Battery Company is a battery manufacturer which specializes in deep cycle batteries. We also manufacture lead pasted plates which are an essential part of the battery manufacturing process.

Presently we package our plates for shipment according to 49 CFR 173.240 for bulk packaging of hazardous materials other than Class 1 and Class 7. We use packaging as specified in (d)(1)(iii) Flexible. The proper shipping name for the plates is:

RQ, Environmentally Hazardous Substances, solid, n.o.s. (Lead), 9, UN 3077, PGIII

Our proposed packaging is fully described on the attached document with photos demonstrating and describing each step in the proposed packaging process. At completion of the packaging process the pallet of product weighs between 1050-1700 pounds.

We are proposing this packaging scheme because lead pasted plates are considered a low hazard material. Using the proposed packaging scheme assures that all the material is contained within the package.

Thank you for your consideration of our request. If we can provide anything further, or if you wish to discuss this matter further, please do not hesitate to contact me at (562) 946-8381, or at the address noted on this letter at the California location.

Very Truly Yours,


Diane H. Kennedy
Director, Environmental Affairs

Enclosure: Proposed Packaging of Plates Procedure, Photos of the packaging process.



PROPOSED OPERATING PROCEDURE

Proposed Packaging of Plates

PAGE 1 OF 1
DOC. NO.: SHIP102

DATE: 10/22/98
REVISION: B

ORIGINAL RELEASE DATE: July 13, 1998
TECHNICAL ORIGINATOR: Kelly Smith
REVISION ORIGINATOR: Chad Bentley, Paul Martinez
DOCUMENT RELEASE BY: Diane Kennedy, Philip Baker
COMMENT: Initial release of new standard operating procedure.

1.0 PURPOSE

The purpose of this proposed procedure is to provide the key components of Packaging for our Plates with approval from the applicable State/ Federal regulatory agencies.

2.0 SCOPE

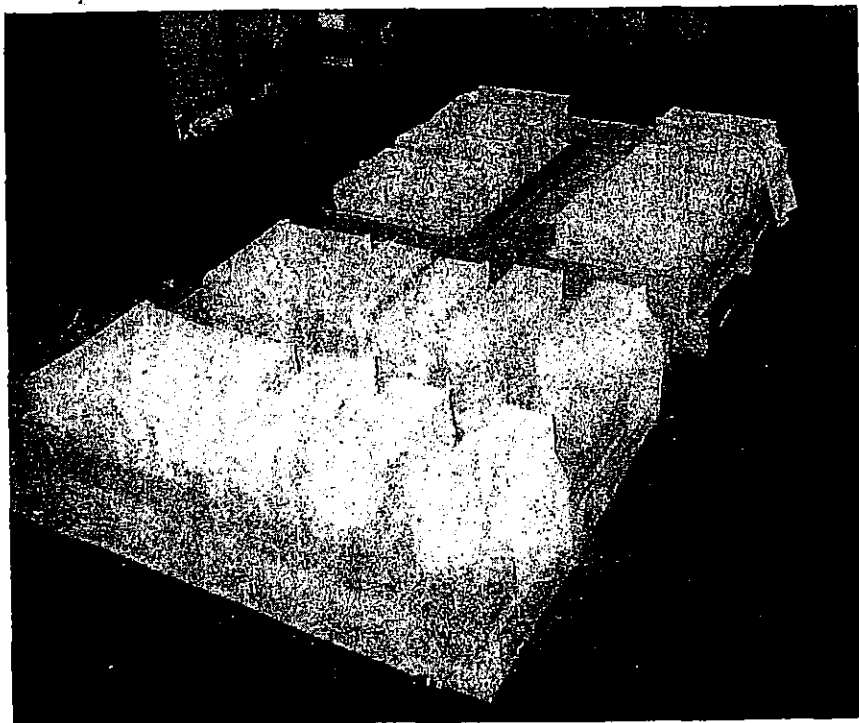
This Proposed Operating Procedure will apply to the Ann Street and Clark Street facilities of Trojan Battery Company to ensure that packaging and hazardous material standards once approved, would be maintained throughout our process. This requires that the Environmental Technician/Engineer be familiar with the procedure and determine that all requirements are being met by periodically auditing this process.

3.0 MATERIALS

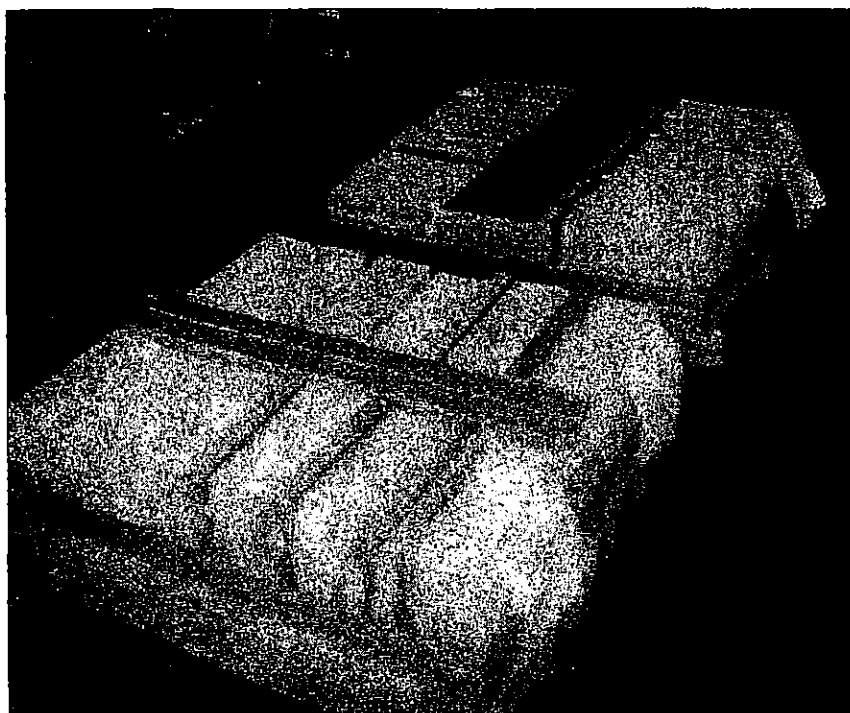
- 3.1 Heavy Duty Pallet: 42 x 42, 7,000 lbs load capacity, COST \$13.50 ea
- 3.2 Plywood: size 43½ x 43½, COST \$6.34 ea
- 3.2 2 Corrugated Trays: 41½ x 34½ x 3½, 78 lbs, COST \$1.48 ea (\$2.96 per pallet)
- 3.3 Banding: 600 lbs (hand-banding), \$0.020 ft (\$0.40 per pallet)
- 3.3 Stretch Film: 115 gauge, COST \$0.030 ft (\$0.50 per pallet)
- 3.4 Honeycomb: size 2½ W x 40L, 13 strips, COST \$0.29 ea strip (\$3.77 per pallet)

4.0 PROCEDURES

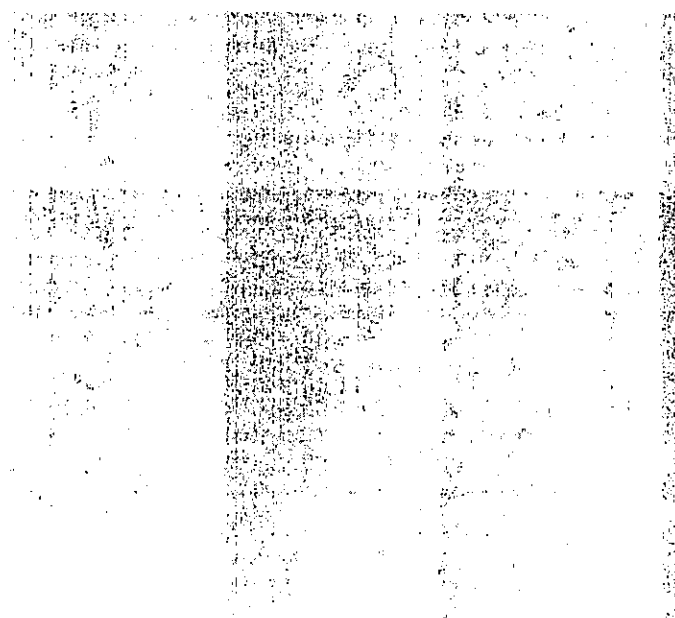
- 4.1 Proposed Plates Packaging Procedure would fall under Class 9 - Environmentally Hazardous Substance; (RQ) Environmentally Hazardous Substances, nos, 9, UN3077, PG 111
- 4.2 Stage 42 x 42 size pallet, load capacity 7,000 lbs., on top of 43½ x 43½ size piece of plywood
- 4.3 Place a 41½ x 34½ x 3½, corrugated tray on bottom of pallet.
- 4.4 Stack plates into corrugated tray (do not exceed load capacity of pallet)
- 4.5 Fill in "spaces" with 13 strips of 2½ W x 40L size honeycomb
- 4.6 Seal with another corrugated tray
- 4.7 Apply Class 9 Hazard Label
- 4.8 Apply Correct Part Number on top of box
- 4.9 Double band plates to pallet with 600 lbs of hand-banding
- 4.10 Plastic rap on Liberty Machine or by hand, plastic should wrap 7 times around pallet
- 4.11 Plates are ready for shipment

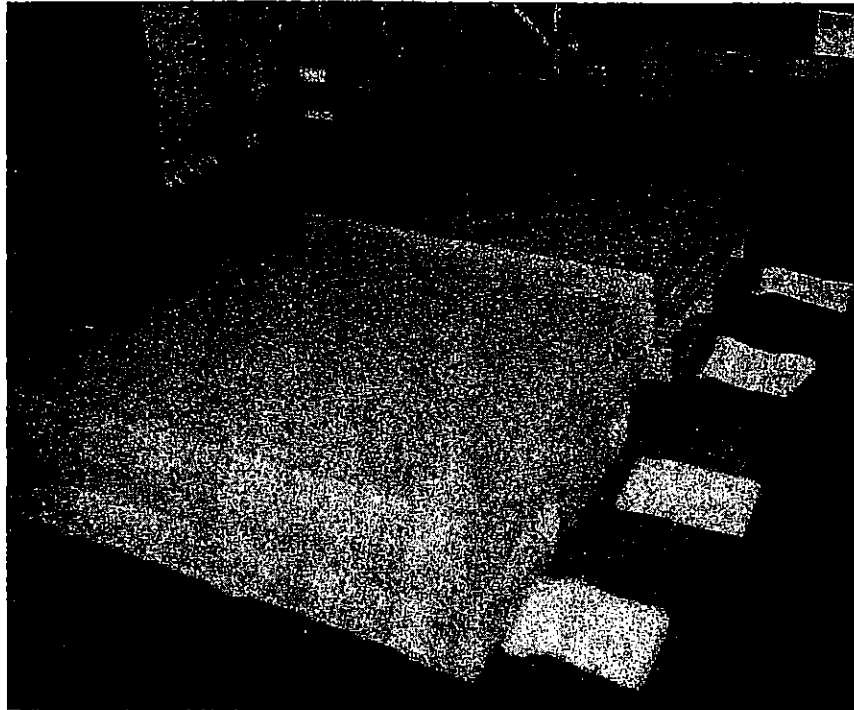


Step # 1
Set your plates in 1 corrugated tray,
on a plywood pallet with 7,000 lbs
load capacity.

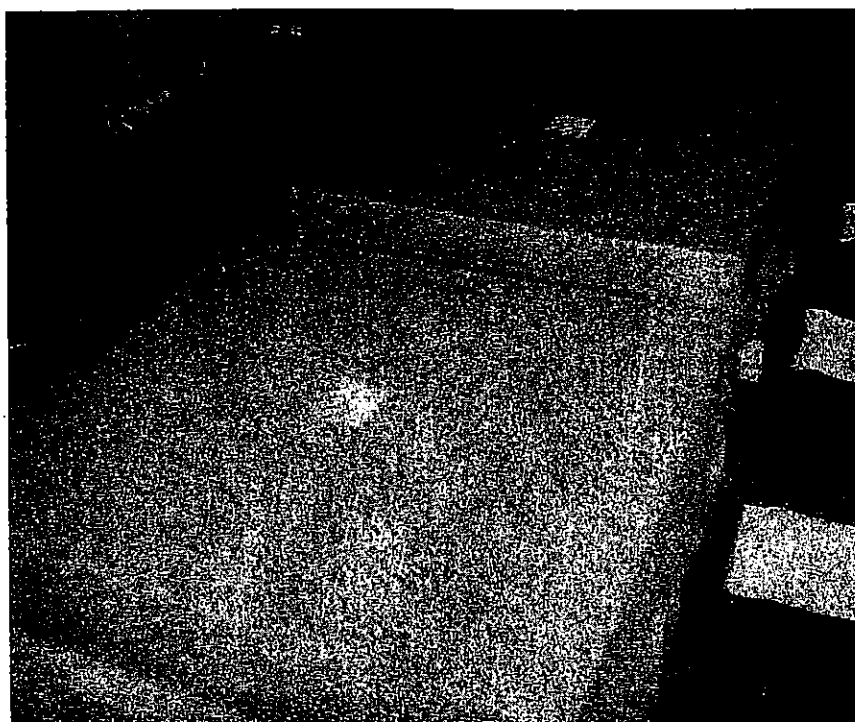


Step # 2
Fill in with Honeycomb.

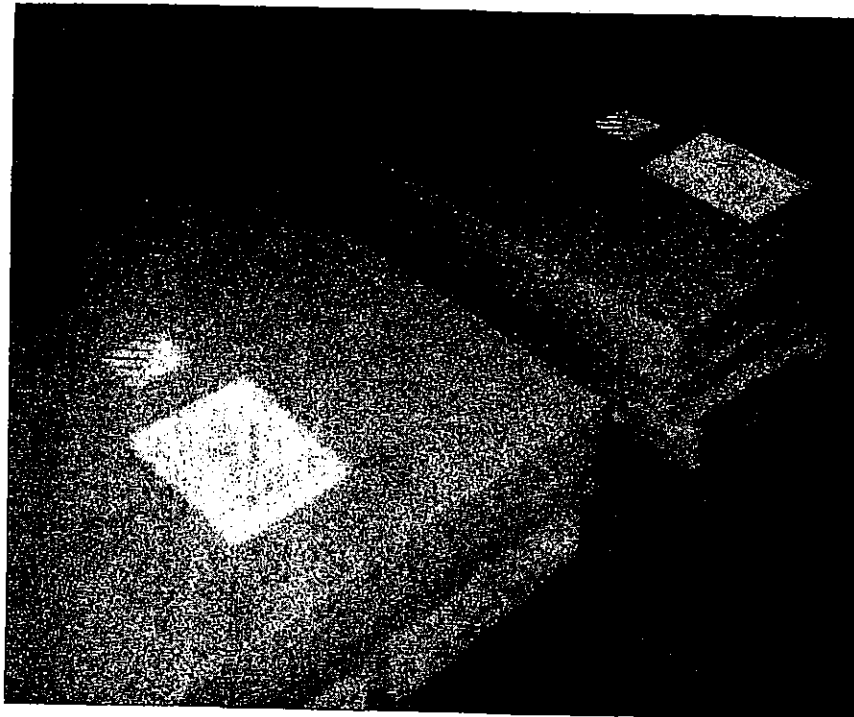




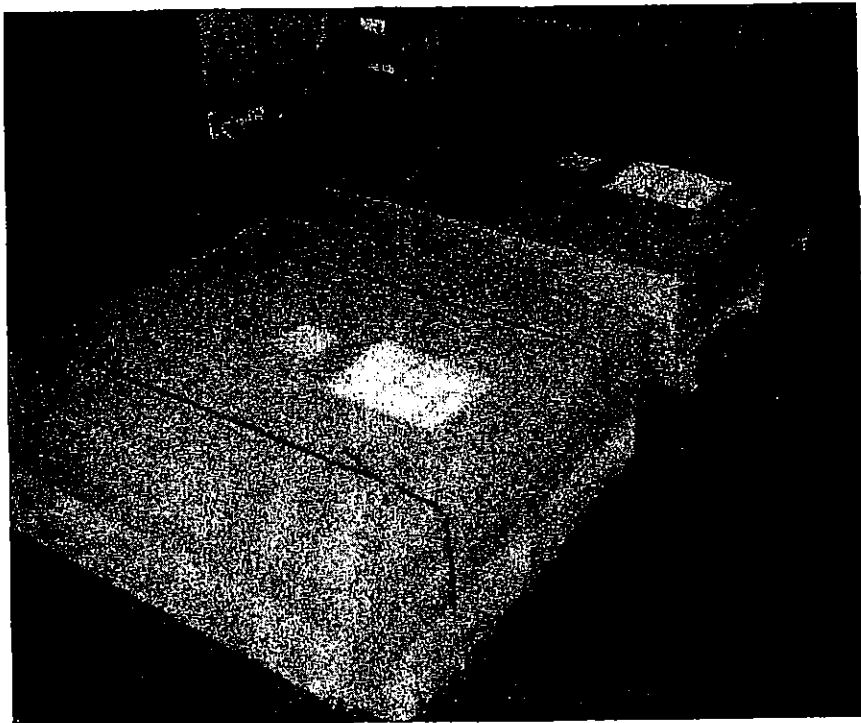
Step # 3
Cover with the second corrugated tray.



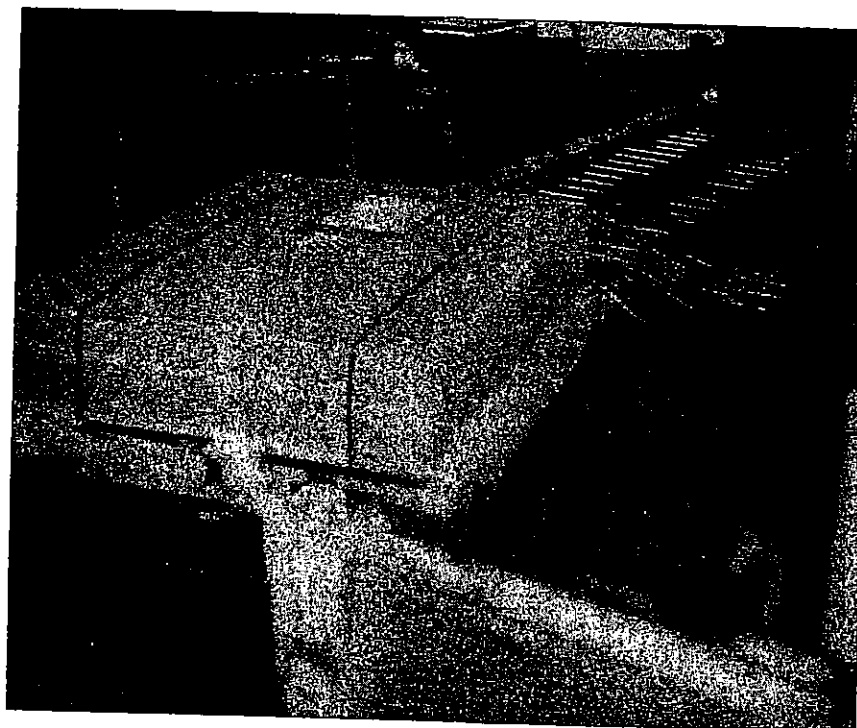
Step #4
Apply Class 9 label to the top of the box.



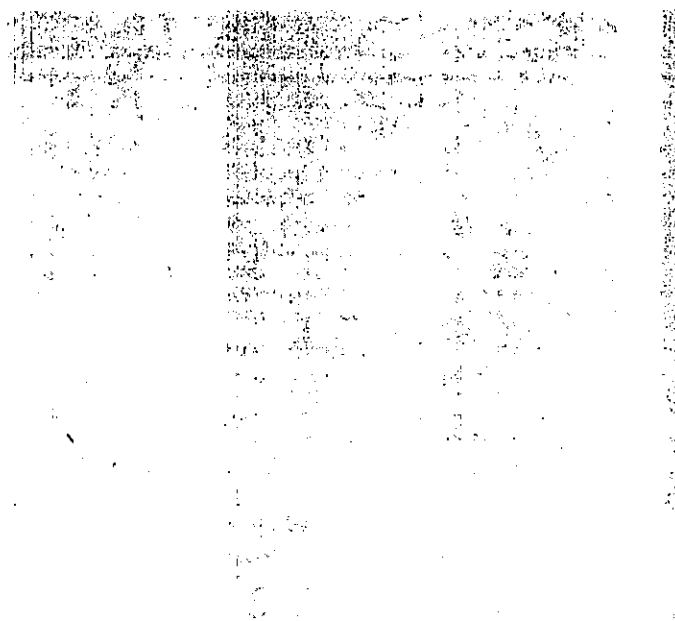
Step # 5
Write correct part # on top of the box.

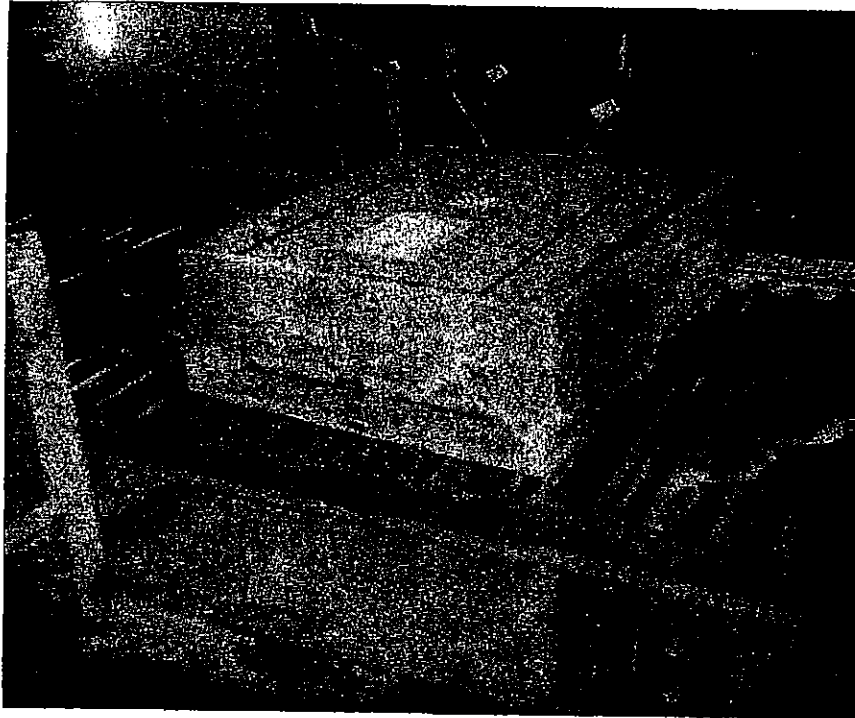


Step # 6
Double band (with 600 lb. banding)
around the box.



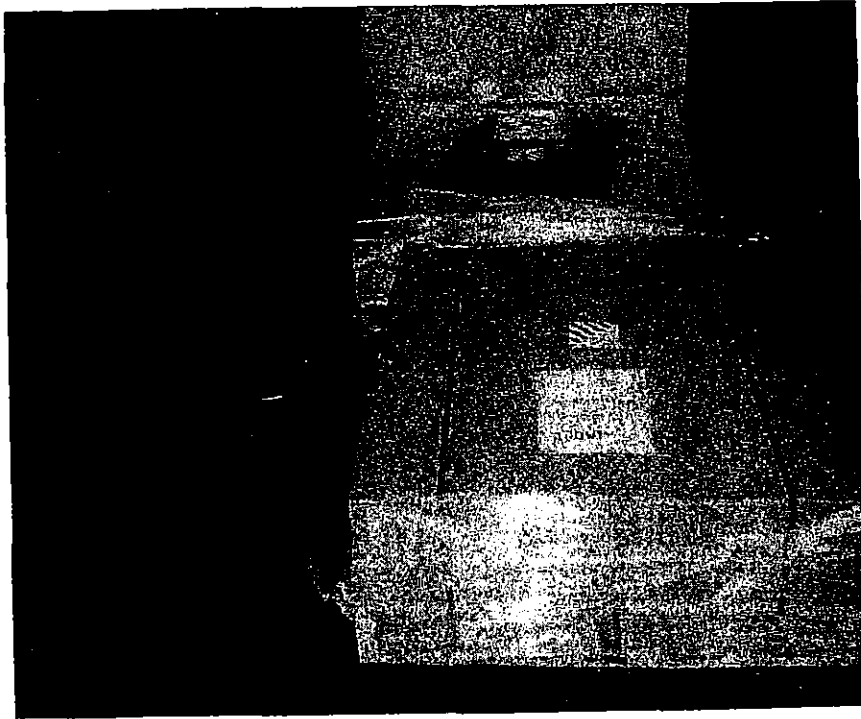
Step # 7
On the Liberty machine plastic wrap
(with 115 gauge plastic wrap 7 times.



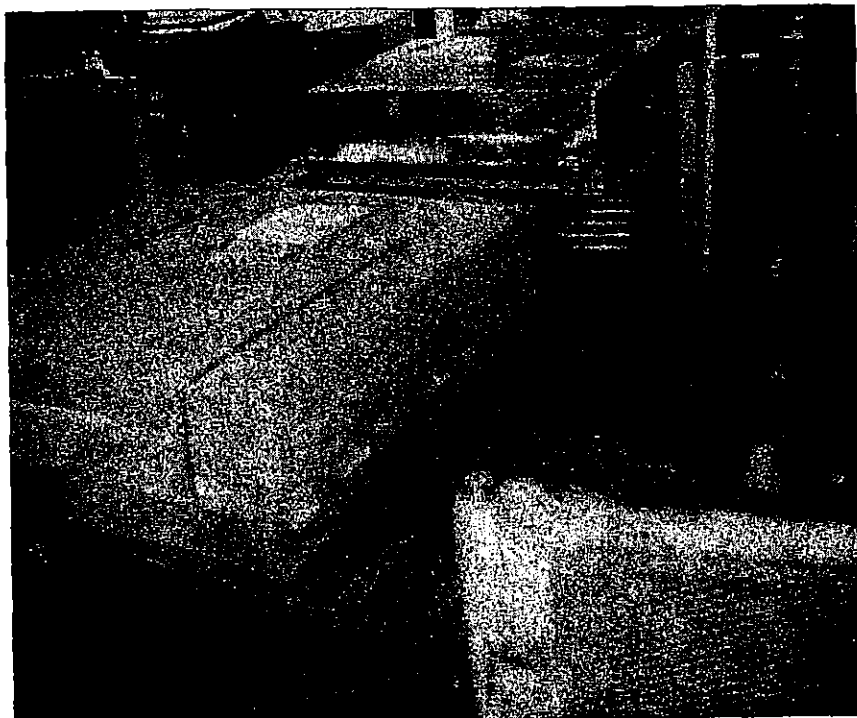


Step # 8

After completed and machine wraps around 7 times.



Step # 9
Task Completed.



Bonus Picture.

